

Mao Declaration

Exhibit 15

[Document Sought to Be Sealed]

Google Terms of Service Choice of
Law Provisions

Google's Terms of Service – Choice of Law Provisions for Class Period

Effective Date	Applicable Text	Summary and Changes
April 14, 2014 ¹ First applicable Terms of Service (“TOS”) during the Class Period	The laws of California, U.S.A., excluding California's conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services. All claims arising out of or relating to these terms or the Services will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.	Applies California law to any disputes arising out of or related to Google's TOS.
October 25, 2017 ²	The laws of California, U.S.A., excluding California's conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services. All claims arising out of or relating to these terms or the Services will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.	No change from April 14, 2014 TOS: applies California law to any disputes arising out of or related to Google's TOS.
March 31, 2020 ³	<p>California law will govern all disputes arising out of or relating to these terms, service-specific additional terms, or any related services, regardless of conflict of laws rules. These disputes will be resolved exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.</p> <p>To the extent that applicable local law prevents certain disputes from being resolved in a California court, then you can file those disputes in your local courts. Likewise, if applicable local law prevents your local court from applying California law to resolve these disputes, then these disputes will be governed by the applicable local laws of your country, state, or other place of residence.</p>	Adds conflict of law provision to allow for lawsuits in local courts. Otherwise, no substantive change from October 25, 2017 TOS: applies California law to any disputes arising out of or related to Google's TOS.
January 5, 2022 ⁴	California law will govern all disputes arising out of or relating to these terms, service-specific additional terms , or any related services , regardless of conflict of laws rules. These disputes will be resolved exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts	Strikes conflict of law provision. Otherwise, no substantive change from March 31, 2020 TOS: applies California law to any disputes arising out of or related to Google's TOS.

¹ Dkt. 83-16; Dkt. 165-17 at p. 8² Dkt. 165-18 at p. 7³ Dkt. 165-19 at pp. 13–14⁴ Google's TOS (effective January 5, 2022) available at: <https://policies.google.com/terms>. Counsel for Plaintiffs and Google agreed that other provisions of the Terms of Service will not release, extinguish, or limit any claims that existed prior to January 5, 2022, either for Plaintiffs or putative class members.